

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460




United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

June 17, 2014

EPA Reg#: 87262-T		DP Barcode: 420755	
		Submission #: 952823	
Product name: <b>Compass THPS 35</b>		Registrant: Compass Chemical International, LLC	
Reviewer's name: Salvador Rodriguez		AD/PSB/CTT- Product Chemistry	
Agency due date: 10/20/14		PSB received date: 06/11/14	
CTT received date: 06/11/14		Science due date: 09/20/14	
Formulation type: EUP			
Integrated system: <input type="checkbox"/>	Non integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: A531		Date Completed: June 17, 2014	
PC Code	CAS #	Active Ingredient Names	% wt (label)
129058	55566-30-8	THPS	35
			
Test Lab: Case Consulting Laboratories.			
MRID(s): 46718401 & 46718402.			
Approver: Karen P. Hicks		Approved date: June 17, 2014	
Guideline: Formulation & OPPTS Guideline, 830 Series Tables "A & B"			
Comments:			

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06/20/14

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**Antimicrobials Division (AD)**

June 17, 2014

**MEMORANDUM**

**Subject:** Review for 87262-T  
Product Name: **Compass THPS 35**  
DP#: 420755

**From:** Salvador Rodriguez, Chemist  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

*[Handwritten signature]*  
*[Handwritten initials]*  
*K.P.H. 6/19/14*

**To:** Zebora Johnson TM 33  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

**Code:** A531

**Date Due:** 10/20/14

**Applicant:** Compass Chemical International, LLC

**Formulation from Label**

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
THPS .....	35

## BACKGROUND:

The registrant, Compass Chemical International, LLC, has submitted Confidential Statement of Formula for the basic formulation and the OPPTS Guideline Series 830 Tables "A & B" to support the me-too registration for the product **Compass THPS 35**. The Product Chemistry Reviewer has received the following documents:

- Confidential Statement of Formula (CSF), dated 05/23/14, for the basic formulation.
- Cover letter, dated 05/23/14. MRID #: 46718400
- Certification with Respect to Citation Data, dated 05/23/14.
- Confidential Statement of Formula, dated 12/06/2000, for the basic formulation. (Reference)
- OPPTS Guideline, Series 830, Tables "A & B". Study titled: "Compass THPS-35. Physical and Chemical characteristics" MRID #s: 46718401 & 46718402.
- Labels for the product pin punched 05/28/14.

## FINDINGS:

1. The CSF, dated 05/23/14, for the basic formulation is revised.
2. All the certified limits meet the EPA 40 CFR, standard certified limits.
3. The CSFs and the label have the same nominal.
4. The OPPTS Guideline Groups "A & B" product chemistry data requirements applicable to end-use products have been met. MRID #s: 46718401 & 46718402

## CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds the CSF for the basic formulation, dated 05/23/14 and the OPPTS Guideline, 830 Series groups "A" and "B" product chemistry requirements for the fungicide, bacteriocide, algacide, non integrated, non food-use, end-use product EPARN: **87262-T** to be acceptable.

## PRODUCT CHEMISTRY REVIEW

### I. CONFIDENTIAL STATEMENT OF FORMULA

a. Type of formulation and source registration:

- Non-integrated formulation system [X]
- Are all TGAIs used registered? Yes [ ] No [X]
- Integrated formulation system [X]
- If "ME-TOO," specify EPA Reg. No. of existing product: 4564-18.

b. Clearance of inerts for non-food or food use:

The product is cleared for food use under 40 CFR §§180.940 and 180.950.  
Yes [ ] No [X]

c. Physical state of product:

*paste*

d. The chemical IDs and analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in 830 Series, Group B.

Yes [X] No [ ]

e. The NCs and CLs are acceptable.

Yes [X] No [ ]

f. Active ingredient

<u>NC</u> (%)	<u>LCL</u> (%)	<u>UCL</u> (%)
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THPS .....	35	33.95	36.05
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g. For products produced by an integrated formulation system:

- Do all impurities of toxicological significance have a UCL?  
Yes [ ] No [ ] Not applicable [X]
- Have all impurities of  $\geq 0.1\%$  in the product been identified?  
Yes [ ] No [ ] Not applicable [X]

## II PRODUCT LABEL

a. The active ingredient statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA. Yes ☒ No ☐

b. The formula contains one of the following:

- |  |                              |  |
|--|------------------------------|--|
| • 10% or more of a petroleum distillate: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • 1.0% or more of methyl alcohol:        | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • sodium nitrite at any level:           | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • a toxic List 1 inert at any level:     | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • arsenic in any form:                   | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

c. If "yes" to any of the above, does the inert ingredients statement contain a footnote indicating this? Yes ☐ No ☐ Not applicable ☒

d. Appropriate warning statement(s) regarding flammability or explosive characteristics of the product are listed on the label.  
Yes ☐ No ☐ Not applicable ☒

e. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.

Yes ☒ No ☐

f. The product requires an expiration date at which time the NC falls below the LCL (based on the 1-year storage stability data or other information).

Yes ☐ No ☒

**Table A:**  
**Product Chemistry (Series 830, Group A)**

<b>Data Requirements</b>	<b>Acceptance of Information</b>	<b>MRID No.</b>
830.1550 Product Identity <sup>1</sup>	A	46718401
830.1600 Description of Materials	A	46718401
830.1620 Production Process <sup>2</sup>	N/R	
830.1650 Formulation Process <sup>3</sup>	A	46718401
830.1670 Formation of Impurities <sup>4</sup>	N/R	
830.1700 Preliminary Analysis <sup>5</sup>	N/R	
830.1750 Certified Limits <sup>6</sup>	A	46718401
830.1800 Enforcement Analytical Method <sup>7</sup>	A	46718401
830.1900 Submittal of Samples	<i>[Samples are to be provided on a case-by-case basis for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

<sup>1</sup>See Confidential Appendix A for additional information.

<sup>2</sup>For MP/EP products produced by an integrated formulation system.

<sup>3</sup>For products from a TGAI or MP.

<sup>4</sup>May be waived unless actual/possible impurities are of toxicological concern.

<sup>5</sup>Five batch analysis required for products produced by an integrated formulation system.

<sup>6</sup>If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

<sup>7</sup>Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc.

**Table B:**  
**Physical and Chemical Characteristics (Series 830, Group B)**

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	Colorless	46718402
830.6303 Physical State	A	Dense Liquid	46718402
830.6304 Odor	A	Aldehyde -like"	46718402
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NR		
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	It is reduced by common reducing agents. It is unaffected by halogens or peroxygen (hydrogen peroxide).	46718402
830.6315 Flammability/Flame Extension	A	The product is not flammable.	
830.6316 Explodability	A	Contains no volatile materials.	
830.6317 Storage Stability	A	The product is stable	Done for EPARN: 87262-4
830.6319 Miscibility <sup>1</sup>	A	Completely inorganic – not soluble with any organic solvent.	
830.6320 Corrosion Characteristics	A	The container is stable.	Done for EPARN 87262-4
830.6321 Dielectric Breakdown Voltage	A	The product is not intended for use in or around electrical equipment.	46718402
830.7000 pH <sup>2</sup>	A	4.36 at 21° C.	46718402
830.7050 UV/Visible Absorption	NR		
830.7100 Viscosity	A	1.38 mm <sup>2</sup> /s at 21° C and 1.12 mm <sup>2</sup> /s at 43° C.	46718402
830.7200 Melting Point/Melting Range	NR		
830.7220 Boiling Point/Boiling Range	NR		
830.7300 Density/Relative Density/Bulk Density	A	1.1155 g/mL at 21° C	46718402

<b>Physical/Chemical Properties*</b>	<b>Acceptance of Data</b>	<b>Value or Qualitative Description</b>	<b>MRID No.</b>
830.7370 Dissociation Constants in Water	N/R		
830.7520 Particle size, fiber length, and diameter distribution.	N/R		
830.7840/830.7860 Water Solubility	NR		
830.7950 Vapor Pressure	NR		

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

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\* Provide brief description, e.g., color – yellow or property value, e.g., density 1.25 g/cc. Unless otherwise indicated, the property should be at 25°C.

<sup>1</sup>If product is an emulsifiable liquid

<sup>2</sup>If product is dispersible with water